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Counsel for Plaintiff,

N.V.E., Inc., and

Third-Party Defendants,

Robert Occhifinto and Walter Orcutt

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

N.V.E., INC.,

Plaintiff,

v.

JESUS J. PALMERONI a/k/a JOSEPH
PALMERONI, RONALD SUMICEK,
SUNBELT MARKETING, ABC
CORPORATIONS 1-10, and JOHN
DOES 1-10,

Defendants.

JESUS J. PALMERONI,

Third-Party Plaintiff,

v.

ROBERT OCCHIFINTO AND WALTER
ORCUTT,

Third-Party Defendants.

CIVIL ACTION NO. 06-5455
(GEB)

Document Electronically
Filed

**NOTICE OF MOTION TO
WITHDRAW REFERRAL OF THIS
CASE TO BANKRUPTCY COURT,
PURSUANT TO 28 U.S.C.
§157**

TO: NEIL GROSSMAN, ESQ.

Bronstein, Gewirtz & Grossman, LLC

144 N. Beverwyck Road, # 187

Lake Hiawatha, New Jersey 07034

C. RONALD STAFFORD, JR., ESQ.
Collier & Basil, P.C.
475 Wall Street
Princeton, New Jersey 08540

SIRS:

PLEASE TAKE NOTICE that on Monday, August 17, 2009 or as soon thereafter as counsel can be heard, Plaintiff, N.V.E., Inc., and Third-Party Defendants, Robert Occhifinto and Walter Orcutt, by and through their attorneys, Pashman Stein, A Professional Corporation, shall move before the Hon. Garrett E. Brown, U.S.D.J. in the United States District Court for the District of New Jersey for an Order withdrawing the referral of this matter to the United States Bankruptcy Court, District of New Jersey.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff and Third-Party Defendants shall rely upon the accompanying Brief in support of this motion and Certification of David G. White.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached.

PLEASE TAKE FURTHER NOTICE that plaintiff hereby requests
oral argument.

PASHMAN STEIN

A Professional Corporation
Attorneys for Plaintiff,
N.V.E., Inc. and Third-Party
Defendants, Robert Occhifinto
and Walter Orcutt

Dated: July 23, 2009

By: s/ Ellen W. Smith

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